### KUTAK ROCK LLP

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### SORLING, NORTHRUP, HANNA, CULLEN & COCHRAN, LTD.

R. Lee Allen, Esq. (admitted pro hac vice) Emily B. Cour, Esq. Suite 800 Illinois Building P.O. Box 5131 Springfield, Illinois 62705 Telephone: 217-544-1144

Co-counsel for Magna Trust Company, Trustee

### IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

In re:	
CIRCUIT CITY STORES, INC., et al.,	Case No. 08-35653-KRH Chapter 11
Debtors.	Jointly Administered

# RESPONSE AND OPPOSITION TO DEBTORS' FORTY-SECOND OMNIBUS OBJECTION TO CLAIMS (DISALLOWANCE OF CERTAIN AMENDED CLAIMS) SEEKING TO DISALLOW CLAIM 8959 FILED BY MAGNA TRUST COMPANY

Magna Trust Company<sup>1</sup>, Trustee ("Magna Trust"), having filed a proof of claim identified and included in the above captioned *Debtors' Forty-second Omnibus Objection* to Claims (Disallowance of Certain Amended Claims) (the "Objection"), does hereby oppose and respond, as set forth below:

<sup>&</sup>lt;sup>1</sup> Magna Trust Company merged into Regions Bank subsequent to the execution of the below mentioned Lease, and, as a result Regions Bank served as trustee of this Illinois title holding land trust up until June 30, 2009, when, by way of Trustee's Deed, Regions Bank conveyed the property commonly known as 3051 West Wabash Ave, Springfield, IL to SWP Wabash Properties, I, LLC, an Illinois Limited Liability Company.

- 1. Circuit City Stores, Inc. and certain of its affiliated entities (collectively, "Debtors") filed a petition for relief on or about November 10, 2008 ("Petition Date"). After the Petition Date, Debtors continued to be in possession of and to operate their business.
- 2. Pursuant to a Lease Agreement dated March 8, 1995 between Circuit City Stores, Inc. and Magna Trust Company, Trustee, under Trust Agreement dated January 26, 1995 and known as Trust No. 01-90-0182-00 (the "Lease"), Circuit City Stores, Inc. leased from Magna Trust real property located at the Southwest Plaza Shopping Center, Springfield, Illinois, as more fully defined in the Lease.
- 3. On or about January 30, 2009, Magna Trust filed a proof of claim, number 8959 (the "Pre-petition Claim"), setting forth a general unsecured claim in the amount of \$59,747.88 representing sums due under the Lease prior to the Petition Date. A copy of the Pre-petition Claim is attached as **Exhibit A**.
- 4. On or about June 22, 2009, Magna Trust filed a proof of claim, number 13763 (the "Administrative Claim," and together with the Pre-petition Claim, the "Claims"), pursuant to 11 U.S.C. §§ 365(d)(3), 503(b) and 507(a)(2) and the Order Setting Administrative Bar Date and Procedures for filing and Objecting to Administrative Expense Requests entered by this Court on May 15, 2009 [Docket No. 3354], setting forth an administrative priority claim for post-petition amounts due from the Debtor pursuant to the Lease totaling \$70,137.54. A copy of the Administrative Claim without exhibits is attached as **Exhibit B**.
- 5. The Objection seeks to disallow certain claims as "rendered moot and superseded by the claimant filing a subsequent 'amending' claim," calling such claims

"repetitive." *Objection*, pp. 5-6. However, the Debtors have mischaracterized the Administrative Claim, thereby confusing it as an amendment rather than a proof of claim with a separate basis for recovery from the Pre-petition Claim. As the Claims are separate in both amounts and bases for relief, the Debtor has provided no basis for the disallowance of either.

6. Based on the above, the Objection should be denied, without further expense, time and effort to the claimant and to the estates of these Debtors.

WHEREFORE, Magna Trust respectfully requests that this Court deny the relief requested in the Objection as it relates to the Claims in its entirety; require Debtors to amend their erroneous classification of the Claims; and such other and further relief as is just and proper.

Dated: Richmond, Virginia October 27, 2009 Respectfully submitted,

/s/ Kimberly A. Pierro

### KUTAK ROCK LLP

Peter J. Barrett (Va. Bar No. 46179) Kimberly A. Pierro (Va. Bar No. 71362) 1111 East Main Street, Suite 800 Richmond, Virginia 23219 Telephone: (804) 644-1700

Facsimile: (804) 783-6192

# SORLING, NORTHRUP, HANNA, CULLEN & COCHRAN, LTD.

R. Lee Allen, Esq. (admitted pro hac vice) Emily B. Cour, Esq. Suite 800 Illinois Building P.O. Box 5131 Springfield, Illinois 62705 Telephone: 217-544-1144 Co-counsel for Magna Trust Company, Trustee

### **CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury that on October 27, 2009, a true and exact copy of the foregoing was served via ECF notification or by first class mail postage prepaid to the following necessary parties defined as the Core Group in the case management order entered November 13, 2008: (i) the Debtors and counsel for the Debtors, (ii) the Office of the United States Trustee for the Eastern District of Virginia, (iii) counsel to the Official Committee of Unsecured Creditors, (iv) counsel to the agents for the Debtors' pre-petition lenders, and (v) counsel to the agents for the Debtors' post-petition lenders, and per the Notice of Objection, via ECF notification specifically to the following:

Gregg M. Galardi, Esq. Ian S. Fredericks, Esq. Skadden, Arps, Slate, Meagher & Flom, LLP One Rodney Square PO Box 636 Wilmington, DE 19899-0636

Chris L. Dickerson, Esq. Skadden, Arps, Slate, Meagher & Flom, LLP 155 North Wacker Drive Chicago, IL 60606

Dion W. Hayes, Esq. Douglas M. Foley, Esq. McGuireWoods LLP One James Center 901 E. Cary Street Richmond, VA 23219

/s/ Kimberly A. Pierro
Counsel

### **DECLARATION**

I declare under penalty of perjury and pursuant to 28 U.S.C. § 1746 that to the best of my knowledge the foregoing is true and correct.

Dated: October **27**, 2009

SWP WABASH PROPERTIES I, LLC, an Illinois Limited Liability Company

Arthur F. Seppi, Manager

Charles E. Robbins, Manager

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The Debtor has listed your claim on Schedule F as a General Unsecured claim in the amount of \$40,622.26. If you agree with this characterization and amount, you do not need to complete and return this form. If you disagree, please complete and return this form accordingly.

D 10 (Official Form 10) (12/07) UNITED STATES BANKRUPTCY COURT FOR THE EA	ASTERN DISTRICT OF VIRGINIA		PROOF OF CLAIM
	gainst which claim is asserted: (Check		
X Circuit City Stores, Inc. (Case No. 08-35653)  U. Circuit City Stores West Coast, Inc. (Case No. 08-35654)  (i) InterTAN, Inc. (Case No. 08-35655)  U. Ventoux International, Inc. (Case No. 08-35656)	<ul> <li>CC Distribution Company of Virginia,</li> <li>Circuit City Stores PR, LLC (Case No.</li> <li>Circuit City Properties, LLC (Case No.</li> <li>Orbyx Electronics, LLC (Case No. 08-</li> </ul>	i, Inc. (Case No. 08-35659) . 08-35660) 5. 08-35661)	☐ Abhott Advertising, Inc. (Case No. 08-35665) ☐ Mayland MN, LLC (Case No. 08-35666) ☐ Patapsco Designs, Inc. (Case No. 08-35667) ☐ Sky Venture Corporation (Case No. 08-35668)
E: Circuit City Purchasing Company, LLC (Case No. 08-35657)	L. Kinzer Technology, LLC (Case No. 08		☐ XSStuff, LLC (Case No. 08-35669)
© CC Aviation, LLC (Case No. 08-35658)	☐ PRAHS, INC. (Case No. 08-35670)		
NOTE: This form should not be used to make a claim for admi	may be filed pursuant to 11 U.S.C.	mencement of the case, A l & 503(a).	request for payment of an administrative expense
Name of Creditor (the person or other entity to whom the debto MAGNA TRUST COMPANY TRUSTEE	π owes money or property):		Check this box to indicate that this claim amends a previously filed claim.
Name and address where notices should be sent:	NameID: 4980969	PackID: 396533	Court Claim Number:(If known)
MAGNA TRUST COMPANY TRUSTEE C/O CIRCUIT CITY PARTNERSHIP 2144 S MACARTHUR BLVD SPRINGFIELD IL 62704	Telephone number:		Filed on:
Name and address where payment should be sent (if different h	om above):		Check this box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars.
	Telephone number:		Check this box if you are the debtor or trustee in this case.
1. Third of Claim and of France Country Country	59,747.88		5. Amount of Claim Entitled to Priority under 11 U.S.C. § 507(a). If any
If all or part of your claim is secured, complete item 4 below; hi	owever, if all of your claim is unsecured,	, do not complete item 4.	portion of your claim falls in one of the following categories, check the
H'all or part of your claim is entitled to priority, complete item.	5		box and state the amount.
3. Check this box if claim includes interest or other charges statement of interest or charges.			Specify the priority of the claim.  Domestic support obligations under
2. Basis for Claim: unpaid rent (unexpire (See instruction #2 on reverse side.) CAM charge	ed lease—see attaches, Insurance and Exp	đ) enses	11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).  Wages, salaries, or commissions (up to
3. Last four digits of any number by which creditor identifies	ies debtor:		\$10,950*) earned within 180 days before filing of the bankruptcy petition
3a. Debtor may have scheduled account as: See (See instruction #3a on reverse side.)	attachment		or cessation of the debtors business, whichever is earlier — 11 U.S.C. § 507(a)(4).
4. Secured Claim (See instruction #4 on reverse side.)	A STATE OF THE STA		§ 507(a)(4).  © Contributions to an employee benefit
Check the appropriate box if your claim is secured by a licinformation.		wide the requested	plan — 11 U.S.C. § 507(a)(5).  Up to \$2,425* of deposits toward
Nature of property or right of setoff: Real Estate Describe:	Motor Vehicle Other		purchase, lease, or rental of property or services for personal, family, or
Value of Property: \$ Annual Interest	Rate		household use — 11 U.S.C. § 507(a)(7).
Amount of arregrage and other charges as of time east	<ul> <li>Taxes or penalties owed to governmental units — 11 U.S.C. § 507(a)(8).</li> </ul>		
	Amount those product		© Other - Specify applicable paragraph of
Amount of Secured Claim: \$		IT U.S.C. § 507(a)().	
6. Credits: The amount of all payments on this claim has been 7. Documents: Attach redacted copies of any documents that s invoices, itemized statements or running accounts, contracts, jud summary. Attach redacted copies of documents providing evide summary. (See definition of "reducted" on reverse side.)  DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DO If the documents are not available, please explain:	*Amount entitled to priority:  *Amounts are subject to adjustment on 4/1/10 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment		
• • • • • • • • • • • • • • • • • • • •	must sign it. Sign and print name and titl	ile, if any, of the creditor or	
	n and state address and relephone number Fattorney, if any.		
Track C	Celebra		3

Penalty for presenting fraudulent claim. Fine of up to \$500,000 or imprisonment for ap to 5 years, or both. 18 U.S.C. §§

MasterCode: 10170361

### B 10 (Official Form 10) (12/97)- Cont.

### INSTRUCTIONS FOR PROOF OF CLAIM FORM

The instructions and definitions below are general explanations of the law. In certain circumstances, such as bankruptcy cases not filed voluntarily by the debtor, there may be exceptions to these general rules.

### Items to be completed in Proof of Claim form

### Court, Name of Debtor, and Case Number:

Fill in the federal judicial district where the bankruptcy case was filed (for example, Central District of California), the bankruptcy debtor's name, and the bankruptcy case number. If the creditor received a notice of the case from the bankruptcy court, all of this information is located at the top of the notice.

### Creditor's Name and Address:

Fill in the name of the person or entity asserting a claim and the name and address of the person who should receive notices issued during the bankruptcy case. A separate space is provided for the payment address if it differs from the notice address. The creditor has a continuing obligation to keep the court informed of its current address. See Federal Rule of Bankruptcy Procedure (FRBP) 2002(g).

### 1. Amount of Claim as of Date Case Filed:

State the total amount owed to the creditor on the date of the Bankruptcy filing. Follow the instructions concerning whether to complete items 4 and 5. Check the box if interest or other charges are included in the claim.

### 2. Basis for Claim:

State the type of debt or how it was incurred. Examples include goods sold, money loaned, services performed, personal injury/wrongful death, car loan, mortgage note, and credit card.

Last Four Digits of Any Number by Which Creditor Identifies Debtor: State only the last four digits of the debtor's account or other number used by the creditor to identify the debtor.

### 3a. Debtor May Have Scheduled Account As:

Use this space to report a change in the creditor's name, a transferred claim, or any other information that clarifies a difference between this proof of claim and the claim as scheduled by the debtor.

### 4. Secured Claim.

Check the appropriate box and provide the requested information if the claim is fully or partially secured. Skip this section if the claim is entirely unsecured. (See DEFINITIONS, below.) State the type and the value of property that secures the claim, attach copies of hen

documentation, and state annual interest rate and the amount past due on the claim as of the date of the bankruptcy filing.

### 5. Amount of Claim Entitled to Priority Under 11 U.S.C. §§ 507(a).

If any portion of your claim falls in one or more of the listed categories, check the appropriate box(es) and state the amount entitled to priority. (See DEFINITIONS, below.) A claim may be partly priority and partly non-priority. For example, in some of the categories, the law limits the amount entitled to priority.

### 6. Credits:

An authorized signature on this proof of claim serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

### 7. Documents

Attach to this proof of claim form redacted copies documenting the existence of the debt and of any lien securing the debt. You may also attach a summary. You must also attach copies of documents that evidence perfection of any security interest. You may also attach a summary. FRBP 3001(c) and (d). Do not send original documents, as attachments may be destroyed after scanning.

### Date and Signature:

The person filing this proof of claim must sign and date it. FRBP 9011. If the claim is filed electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what constitutes a signature. Print the name and title, if any, of the creditor or other persun authorized to file this claim. State the filer's address and telephone number if it differs from the address given on the top of the form for purposes of receiving notices. Attach a complete copy of any power of attorney. Criminal penalties apply for making a false statement on a proof of claim.

### DEFINITIONS

### Debtor

A debtor is the person, corporation, or other entity that has filed a bankruptcy case.

### Credito

A creditor is the person, corporation, or other entity owed a debt by the debtor on the date of the bankruptey filing.

### Claim

A claim is the creditor's right to receive payment on a debt that was owed by the debtor on the date of the bankruptcy filling. See 11 U.S.C. § 101(5). A claim may be secured or unsecured.

### Proof of Claim

A proof of claim form is a form used by the creditor to indicate the amount of the debt owed by the debtor on the date of the bankruptcy filing. The creditor must file the form with the clerk of the same bankruptcy court in which the bankruptcy case was filed

### Secured Claim Under 11 U.S.C. § 506(a)

A secured claim is one backed by a lien on property of the debtor. The claim is secured so long as the creditor has the right to be paid from the property prior to other creditors. The amount of the secured claim cannot exceed the value of the property. Any amount owed to the creditor in excess of the value of the property is an unsecured claim. Examples of liens on property include a mortgage on real estate or a security interest in a car.

A lien may be voluntarily granted by a debtor or may be obtained through a court proceeding. In some states, a court judgment is a lien. A claim also may be secured if the creditor owes the debtor money (has a right to setoff).

### Unsecured Claim

An unsecured claim is one that does not meet the requirements of a secured claim. A claim may be partly unsecured if the amount of the claim exceeds the value of the property on which the creditor has a lien.

Claim Entitled to Priority Under 11 U.S.C. §§ 507(a) Priority claims are certain categories of unsecured claims that are paid from the available money or property in a bankruptcy case before other unsecured claims.

### Redacted

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. A creditor should redact and ose only the last four digits of any social-security, individual's tax-identification, or financial-account number, all but the initials of a minor's name and only the year of any person's date of birth.

### Evidence of Perfection

Evidence of perfection may include a mortgage, lien, certificate of title, financing statement, or other document showing that the lien has been filed or recorded.

### INFORMATION

### Acknowledgement of Filing a Claim

To receive acknowledgment of your filing, you may either enclose a stamped self-addressed envelope and a copy of this proof of claim or to view your filed proof of claim you may access the court's PACER system (www.pacer.psc.uscourts.gov) for a small fee to view your filed proof of claim.

### Offers to Purchase a Claim

Certain entities are in the business of purchasing claims for an amount less than the face value of the claims. One or more of these entities may contact the creditor and offer to purchase the claim. Some of the written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court or the debtor. The creditor has no obligation to sell its claim. However, if the creditor decides to sell its claim, any transfer of such claim is subject to FRBP 3001(e), any applicable provisions of the Bankruptcy Code (11 U.S.C. § 101 et sea), and any applicable orders of the bankruptcy court.

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Magna Trust Company Trustee

Attachment 1

Proof of Claim

### 2. Basis for Claim:

This claim is filed for rent, CAM charges, insurance and expenses which were unpaid as of November 10, 2008. Specifically, the unpaid charges are as follows:

a)	balance forward on account:	\$ 7,278.57
b)	unpaid rent for November 2008:	40,622.26
c)	CAM charges incurred in 2008:	6,189.05
d)	insurance for 2008:	5,658.00
	TOTAL OUTSTANDING	\$ 59,747.88

As of the date this Claim is filed we have yet to receive notice that Debtor has rejected the lease between Circuit City Stores, Inc. and Magna Trust Company, Trustee, under Trust Agreement dated January 26, 1995 and known as Trust No. 01-90-0182-00 ("Lease") (attached hereto), however, we reserve the right to file at a later date a proof of claim and/or request for payment of administrative expenses under 11 U.S.C. § 502 and 11 U.S.C. § 365, and reserve all other remedies available to us as the landlord of an unexpired lease.

### 3a. Debtor May Have Scheduled Account As:

We received six (6) separate proof of claim forms, all addressed to Magna Trust Company, Trustee of an Illinois title holding land trust, with the following NameIDs and PackIDs:

<u>NameID</u>	<u>PackID</u>
4980969	396533
4556792	230661
4556789	230662
4980971	396534
5068807	451913
4556795	230660

While all of the above forms name the same creditor, Magna Trust Company, Trustee, they contained different "C/O" names. The "C/O" names as listed on the different proof of claim forms and on Schedule F by the Debtor include the following:

Magna Trust Company, Trustee C/O Circuit City Partnership 2144 S. Macarthur Blvd. Springfield, IL 62704

And

Magna Trust Company, Trustee

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Magna Trust Company Trustee

Attachment 1

Proof of Claim

Attn: Charles E. Rob [sic] C/O Charles Robbins Realty 2144 SO. Macarthur Boulevard Springfield, IL 62704

The correct name and address of the creditor where notices and payment should be sent is:

Magna Trust Company, Trustee C/O Circuit City Partnership Charles E. Robbins Realtor 2144 S. Macarthur Blvd. Springfield, IL 62704

In light of the above, we are therefore only filing one (1) proof of claim form which will cover all claims of Magna Trust Company, Trustee and all proof of claim forms received with the above NameIDs and PackIDs.

### 7. Documents:

See the following attached documents that support the claim:

- a) Circuit City Partnership Customer Balance Detail as of January 29, 2009
- b) 2008 Insurance Statement
- c) 2008 CAM Statement
- d) Circuit City Partnership Transaction Detail by Account, January December 2008

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Proof of Claim

10:48 AM 01/29/09

### Circuit City Partnership Customer Balance Detail

As of January 29, 2009

Type	Date	Num A	mount	Balance	
Payment	8/1/2008		-40,622,26	7,278,57	
Invoice	9/1/2008	178	40,622.26	47,900.83	
Payment	9/5/2008		-40,622.26	7.278.57	
Invoice	10/1/2008	179	40,622.26	47,900.83	
Payment	10/1/2008		-40.622.26	7.278.57	
Invoice	11/1/2008	180	40,622.26	47,900,83	
Invoice	12/1/2008	<b>1</b> 81	40,622.26	88,523.09	
Payment	12/8/2008	4581188	-40,622.26	47,900.83	
Invoice	1/1/2009	182 JAN: OF RENT	40,622.26	88,523.09	- OPEN
Payment	1/5/2009	0004590748	-40,622,26	47,900,83	
Invoice	1/29/2009	183 2008 CAM REC.	6,189.05	54,089.88	€ O PEN
Invoice	1/29/2009	184 INSUR.	5,658.00	59,747.88	& OPEN
Total Circuit City		VIII 1 Novind to January	46,811.31	59,747.88	
TOTAL			46,811.31	59,747.88	

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Magna Trust Company Trustee

Attachment 1

Proof of Claim

January 29, 2009

Ms. Annette Vinniane Circuit City Stores, Inc. 9954 Mayland Drive Richmond, VA 23233

Re: Circuit City Store Location #3169

2008	8 INSURANCI	ESTATEMEN	r
T.J. Nicoud & Co	mpany		\$ 5.658.00

TOTAL DUE FOR 2008 INSURANCE \$ 5,658.00

Please remit payment to: Charles Robbins Realtor Commercial Division 2144 S. MacArthur Blvd. Springfield, IL 62704

Proof of Claim

January 29, 2009

Ms. Annette Vinniane Circuit City Stores, Inc. 9954 Mayland Drive Richmond, VA 23233

Re: Circuit City Store Location #3169

2008 CAM STATEMEN	T	
Common Area Utilities	\$	8,229.90
Parking Lot Lighting (Maint./Repair)	\$	7,773.41
Landscaping	\$	5,475.99
Parking Lot Sweeping	\$	2,040.00
Miscellaneous Maint.	\$	2,116.56
Snow Removal	\$	6,882.23
Total 2008 CAM Charges	\$	32,518.09
5% Administration Fee	\$	1,625.90
	\$	34,143.99
Tenant % of Shopping Center		73.60%
., .	\$	25,129.98
Less credit for CAM Cap	\$	174.61
Less amount paid 1/01/08 - 12/31/08	\$	18,766.32
TOTAL DUE FOR 2008 CAM:	\$	6,189.05

### Please remit payment to:

Charles Robbins Realtor Commercial Division 2144 S. MacArthur Blvd. Springfield, IL 62704

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Magna Trust Company Trustee

Attachment 1

Proof of Claim

# Circuit City Partnership Transaction Detail by Account

1742   1742   1742   1742   1742   1744   1742   1744   1744   1745   1746   1756   1756   1756   1756   1756   1756   1756   1756   1756   1756   1757	1742 Ryan Electric. Inc. Pipping Physiology Manage. 1756 CWLP Per Physiology Inc. Physiology Manage. 1756 CWLP Per Physiology Inc. Physiology	Date CAM	Num	Name	Memo	Amount
## #02625540-00028959 CWLP ## #0262540-00028959 CWLP ## #0262540-00028959 CWLP ## #0262540-0002895999999999999999999999999999999999	### ### ### ##########################	أرد 08 008	1742 Elec, read 1/16/08	Ryan Electric, Inc. Cwii P	replace 1000 w brdlss	177 36
1758   Ryan Electric, Inc	Fig. 8 (WLP)  Fig. 6 (WLP)  Fig. 6 (WLP)  Fig. 777  Fig. 7 (WLP)  Fig. 7 (WLP)  Fig. 7 (WLP)  Fig. 7 (WLP)  Fig. 8	008	#026225240-00028959	CWLP	ighting lighting	930.08
1770   CVNLP	1750 8 1770 9 17	900 000	1758 1759	Ryan Electric, Inc.	replace light lamps	368.92
1770   CVALP	1770 CVALP 1771 CVALP 1771 CVALP 1772 CVALP 1773 CVALP 1774 CVALP 1774 CVALP 1775 CVALP 1776 CVALP 1776 CVALP 1777 CVALP 1777 CVALP 1777 CVALP 1778 CVALP 1779 CVALP 1770 CVALP 1771 CVALP 1771 CVALP 1771 CVALP 1772 CVALP 1773 CVALP 1774 CVALP 1774 CVALP 1775 CVALP 1775 CVALP 1776 CVALP 1776 CVALP 1776 CVALP 1776 CVALP 1776 CVALP 1776 CVALP 1777 CVALP 1777 CVALP 1778 CVALP	900	1760	Bendsen Signs and Graphics Inc.	parking for ignis	799,09
1775   Syan Electric, Inc	1775 CWAP COULD parking to Larys. CWAP COULD parking to Larys. CWAP COULD parking to Larys. CWALP CWALP COULD parking to Larys. CWALP CWALP CWALP CWALP parking to Larys. CWALP CWALP CWALP parking to Larys. CWALP CWAL	900	1770	CWLP	parking lot lights	4,635,61
1777   CWLP	1777 CWLP 1789 CWLP 1780 CMarles E Robbins Property Manage. clean up landscaping 1780 Charles E Robbins Property Manage. clean up landscaping 1773 Charles E Robbins Property Manage. clean up landscaping 1776 Charles E Robbins Property Manage. clean up landscaping 1776 Charles E Robbins Property Manage. clean up landscaping 1776 Charles E Robbins Property Manage. clean to landscaping 1776 Charles E Robbins Property Manage. clean to landscaping 1776 Charles E Robbins Property Manage. clean toon mowing 1776 Charles E Robbins Property Manage. clean toon chemicals 1781 Charles E Robbins Property Manage. clean toon chemicals 1781 Charles E Robbins Property Manage. clean toon chemicals 1782 Charles E Robbins Property Manage. clean toon chemicals 1784 Charles E Robbins Property Manage. clean toon chemicals 1785 Charles E Robbins Property Manage. clean toon chemicals 1786 Charles E Robbins Property Manage. clean toon chemicals 1787 Charles E Robbins Property Manage. clean toon chemicals 1788 Charles E Robbins Property Manage. clean toon chemicals 1789 Charles E Robbins Property Manage. clean toon chemicals 1780 Charles E Robbins Property Manage. clean toon chemicals 1781 Charles E Robbins Property Manage. clean toon chemicals 1781 Charles E Robbins Property Manage. clean toon chemicals 1784 Charles E Robbins Property Manage. clean toon chemicals 1785 Charles E Robbins Property Manage. clean toon chemicals 1786 Charles E Robbins Property Manage. clean toon chemicals 1787 Charles E Robbins Property Manage. clean toon chemicals 1788 Charles E Robbins Property Manage. clean toon chemicals 1788 Charles E Robbins Property Manage. clean toon chemicals 1788 Charles E Robbins Property Manage. clean toon chemicals 1788 Charles E Robbins Property Manage. clean toon chemicals 1788 Charles E Robbins Propert	900	1775	Ryan Electric, Inc.	parking lot lamps	177.36
1782   CWLP     1789   CWLP     1799   CWLP     1813   CWLP     1820   CWLP     1821   CWLP     1822   CWLP     1825   CWLP     1764   Charles E. Robbins Property Manage     1765   Charles E. Robbins Property Manage     1779   Charles E. Robbins Property Manage     1781   Charles E. Robbins Property Manage     1781   Charles E. Robbins Property Manage     1781   Charles E. Robbins Property Manage     1782   Charles E. Robbins Property Manage     1783   Charles E. Robbins Property Manage     1784   Charles E. Robbins Property Manage     1785   Charles E. Robbins Property Manage     1786   Charles E. Robbins Property Manage     1787   Charles E. Robbins Property Manage     1788   Charles E. Robbins Property Manage     1795   Charles E. Robbins Property Manage     1796   Charles E. Robbins Property Manage     1797   Charles E. Robbins Property Manage     1798   Charles E. Robbins Property Manage     1799   Charles E. Robbins Property Manage     1795   Charles E. Robbins Property Manage     1796   Charles E. Robbins Property Manage     1797   Charles E. Robbins Property Manage     1798   Charles E. Robbins Property Manage     1799   Charles E. Robbins Property Manage     1796   Charles E. Robbins Property Manage     1796   Charles E. Robbins Property Manage     1797   Charles E. Robbins Property Manage     1798   Charles E. Robbins Property Manage     1799   Charles E. Robbins Property Manage     1796   Charles E. Robbins Property Manage     1797   Charles E. Robbins Property Manage     1798   Charles E. Robbins Property Manage     1799   Charles E. Robbins Property Manage     1791   Charles E. Robbins Property Manage     1792   Charles E. Robbins Property Manage     1796   Charles E. Robbins Property Manage     1797	1782 CWIP 1789 CWIP 1780 CWIP 1780 CWIP 1880 C	800	1777	CWLP	parking lot lights	505.34
CWLP 1799 1797 1799 1799 1799 1799 1799 179	1739 CWLP 1739 CWLP 1739 CWLP 1739 CWLP 1739 CWLP 1730 CWLP 1730 CWLP 1743 CWLP 1751 CWLP 1751 CWLP 1752 CWLP 1753 Charles E. Robbins Property Manage clean up landscraping 1754 Charles E. Robbins Property Manage clean up landscraping 1754 Charles E. Robbins Property Manage clean up landscraping 1754 Charles E. Robbins Property Manage clean up landscraping 1754 Charles E. Robbins Property Manage clean up landscraping 1755 Charles E. Robbins Property Manage clean up landscraping 1775 Charles E. Robbins Property Manage clean up landscraping 1776 Charles E. Robbins Property Manage clean up landscraping 1776 Charles E. Robbins Property Manage clean up landscraping 1776 Charles E. Robbins Property Manage clean up landscraping 1776 Charles E. Robbins Property Manage clean up landscraping 1781 Charles E. Robbins Property Manage clean up landscraping 1781 Charles E. Robbins Property Manage detention chemicals 1783 Charles E. Robbins Property Manage mowing detention 1784 Charles E. Robbins Property Manage mowing detention 1785 Charles E. Robbins Property Manage mowing capturing 1787 Charles E. Robbins Property Manage mowing capturing 1788 Charles E. Robbins Property Manage mowing capturing 1789 Charles E. Robbins Property Manage mowing capturing 1791 Charles E. Robbins Property Manage mowing capturing 1792 Charles E. Robbins Property Manage mowing capturing 1793 Anderson Mowing 1794 Charles E. Robbins Property Manage mowing capturing 1795 Charles E. Robbins Property Manage mowing capturing 1795 Charles E. Robbins Property Manage mowing 1796 Charles E. Robbins Property Manage mowing capturing 1796 Charles E. Robbins Property Manage mowing capturing 1797 Charles E. Robbins Property Manage mowing capturing 1798 Charles E. Robbins Property Manage mowing capturing 1798 Charles E. Robbins Property Manage mowing 1799 Charles E. Robbins Property Manage mowing 1799 Charles E. Robbins Property Manage mowing 1799 Charles E. Robbins Property	200	1782	CWLP	parking lot lights	651,46
1797 CWLP  1799 Imperial Designs  1799 CWLP  1813 CWLP  1826 CWLP  1827 CWLP  1828 CWLP  1743 Charles E. Robbins Property Manage  1761 Charles E. Robbins Property Manage  1764 Charles E. Robbins Property Manage  1765 Charles E. Robbins Property Manage  1766 Charles E. Robbins Property Manage  1776 Charles E. Robbins Property Manage  1776 Charles E. Robbins Property Manage  1776 Charles E. Robbins Property Manage  1781 Charles E. Robbins Property Manage  1782 Charles E. Robbins Property Manage  1783 Charles E. Robbins Property Manage  1784 Charles E. Robbins Property Manage  1785 Charles E. Robbins Property Manage  1786 Charles E. Robbins Property Manage  1787 Charles E. Robbins Property Manage  1788 Charles E. Robbins Property Manage  1791 Charles E. Robbins Property Manage  1792 Charles E. Robbins Property Manage  1793 Charles E. Robbins Property Manage  1795 Charles E. Robbins Property Manage  1796 Charles E. Robbins Property Manage  1797 Charles E. Robbins Property Manage  1798 Charles E. Robbins Property Manage  1799 Charles E. Robbins Property Manage  1795 Charles E. Robbins Property Manage  1796 Charles E. Robbins Property Manage  1797 Charles E. Robbins Property Manage  1798 Charles E. Robbins Property Manage  1798 Charles E. Robbins Property Manage	1799 Imperial Designs Parking lot lights 1897 CWLP 1897 CWLP 1897 CWLP 1898 CWLP 1895 CWLP 1895 CWLP 1896 CHarles E. Robbins Property Manage clean up landscaping 1761 Charles E. Robbins Property Manage spring fertilizer/weed control 1784 Charles E. Robbins Property Manage spring fertilizer/weed control 1785 Charles E. Robbins Property Manage spring fertilizer/weed control 1786 Charles E. Robbins Property Manage spring fertilizer/weed control 1786 Charles E. Robbins Property Manage detention trash 1789 Charles E. Robbins Property Manage detention charles. 1789 Charles E. Robbins Property Manage detention charles. 1780 Charles E. Robbins Property Manage detention charles. 1781 Charles E. Robbins Property Manage detention charles. 1781 Charles E. Robbins Property Manage mowing detention 1782 Charles E. Robbins Property Manage mowing detention 1784 Charles E. Robbins Property Manage mowing detention 1785 Charles E. Robbins Property Manage mowing detention 1786 Charles E. Robbins Property Manage mowing detention 1786 Charles E. Robbins Property Manage mowing detention 1786 Charles E. Robbins Property Manage mowing detention 1787 Charles E. Robbins Property Manage mowing detention 1788 Charles E. Robbins Property Manage mowing detention 1789 Charles E. Robbins Property Manage mowing detention 1780 Charles E. Robbins Property Manage mowing detention 1781 Charles E. Robbins Property Manage mowing detention 1782 Charles E. Robbins Property Manage mowing detention 1784 Charles E. Robbins Property Manage mowing detention 1785 Charles E. Robbins Property Manage mowing detention 1786 Charles E. Robbins Property Manage mowin	200	1789	CWLP	parking lot lights	602.35
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CWLP  1823 CWLP CWLP  1825 CWLP CWLP  1825 CWLP CWLP  CHAPES E. Robbins Property Manage Charles E. Robbins Property Manage	18.25 CWLP 18.25 CWLP 18.26 CWLP 18.26 CWLP 18.26 CWLP 18.27 CWLP 18.28 CWLP 18.29 CWLP 18.29 CWLP 18.20 Charles E Robbins Property Manage relamp pyton sign 17.43 Charles E Robbins Property Manage remove plants at entrance 17.64 Charles E Robbins Property Manage remove plants at entrance 17.65 Charles E Robbins Property Manage remove plants at entrance 17.79 Anderson Mowing 17.71 Anderson Mowing 17.71 Charles E Robbins Property Manage detention mowing 17.71 Charles E Robbins Property Manage detention chemicals 17.72 Charles E Robbins Property Manage detention chemicals 17.73 Anderson Mowing 17.74 Charles E Robbins Property Manage detention chemicals 17.75 Charles E Robbins Property Manage detention chemicals 17.76 Charles E Robbins Property Manage detention chemicals 17.77 Charles E Robbins Property Manage detention chemicals 17.78 Charles E Robbins Property Manage detention chemicals 17.79 Charles E Robbins Property Manage detention detention mowing	200	77 77 77 77 77 77 77 77 77 77 77 77 77	Imperial Designs	relamp pylon sign	1,844,50
CWLP  1825  CWLP  1826  1827  CWLP  CWLP  CWLP  CWLP  CHAIPS E. Robbins Property Manage  1764  Charles E. Robbins Property Manage	16, 1822 CWLP 1825 CWLP 1826 CWLP 1827 CWLP 1828 CWLP 1828 CWLP 1829 CWLP 1826 Charles E. Robbins Property Manage clean up landscraping 1764 Charles E. Robbins Property Manage trash pickup detention 1764 Charles E. Robbins Property Manage trash pickup detention 1764 Charles E. Robbins Property Manage trash pickup detention 1775 Charles E. Robbins Property Manage detention moving 1776 Charles E. Robbins Property Manage detention chemicals 1781 Charles E. Robbins Property Manage detention chemicals 1782 Charles E. Robbins Property Manage detention chemicals 1783 Charles E. Robbins Property Manage moving detention 1784 Charles E. Robbins Property Manage moving detention 1785 Charles E. Robbins Property Manage moving detention 1786 Charles E. Robbins Property Manage moving detention 1787 Charles E. Robbins Property Manage moving to tandscaping 1787 Charles E. Robbins Property Manage moving to tandscaping 1789 Charles E. Robbins Property Manage moving to tandscaping 1781 Charles E. Robbins Property Manage detention chemicals 1783 Tugeren Charles E. Robbins Property Manage detention 1794 Anderson Mowing 1795 Charles E. Robbins Property Manage detention 1795 Charles E. Robbins Property Manage detention mowing	2006	1813	CWLP	parking lot lights	652,95
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1759 Tragreen Chenriawn 1773 Charles E. Robbins Property Manage 1776 Charles E. Robbins Property Manage 1776 Charles E. Robbins Property Manage 1781 Charles E. Robbins Property Manage 1781 Charles E. Robbins Property Manage 1781 Charles E. Robbins Property Manage 1783 Charles E. Robbins Property Manage 1783 Charles E. Robbins Property Manage 1784 Charles E. Robbins Property Manage 1785 Charles E. Robbins Property Manage 1786 Charles E. Robbins Property Manage 1787 Charles E. Robbins Property Manage 1788 Charles E. Robbins Property Manage 1791 Charles E. Robbins Property Manage 1792 Charles E. Robbins Property Manage 1793 Trugreen Chemlawn 1795 Charles E. Robbins Property Manage 1796 Charles E. Robbins Property Manage 1797 Charles E. Robbins Property Manage 1798 Charles E. Robbins Property Manage 1799 Charles E. Robbins Property Manage	Try 173 Trugreen Chemilawn  Try 2 Charles E Robbins Property Manage defention moving  Try 3 Anderson Mowing  Try 3 Anderson Mowing  Try 4 Charles E Robbins Property Manage detention moving  Try 5 Charles E Robbins Property Manage trash bags  Try 6 Charles E Robbins Property Manage trash bags  Try 7 Charles E Robbins Property Manage trash bags  Try 8 Charles E Robbins Property Manage detention moving  Charles E Robbins Property Manage detention chemicals  Try 6 Charles E Robbins Property Manage moving detention  Charles E Robbins Property Manage moving rear ditch  Charles E Robbins Property Manage moving rear ditch  Charles E Robbins Property Manage moving rear ditch  Charles E Robbins Property Manage detention chemicals  Try 8 Charles E Robbins Property Manage detention chemicals  Try 8 Charles E Robbins Property Manage detention chemicals  Try 793 Try 6 Charles E Robbins Property Manage detention chemicals  Try 794 Charles E Robbins Property Manage detention chemicals  Try 795 Charles E Robbins Property Manage detention chemicals  Try 796 Charles E Robbins Property Manage detention mowing  Try 797 Charles E Robbins Property Manage detention mowing  Try 798 Charles E Robbins Property Manage detention mowing  Try 799 Charles E Robbins Property Manage detention mowing  Try 799 Charles E Robbins Property Manage detention mowing	ÇR ÇR	1764	Charles E. Robbins Property Manage	remove plants at entrance	00.86
Charles E. Robbins Property Manage  1773 Anderson Mowing 1776 Charles E. Robbins Property Manage 1779 Anderson Mowing 1781 Charles E. Robbins Property Manage 1781 Charles E. Robbins Property Manage 1781 Charles E. Robbins Property Manage 1783 Charles E. Robbins Property Manage 1784 Charles E. Robbins Property Manage 1785 Charles E. Robbins Property Manage 1786 Charles E. Robbins Property Manage 1787 Charles E. Robbins Property Manage 1788 Charles E. Robbins Property Manage 1791 Charles E. Robbins Property Manage 1791 Charles E. Robbins Property Manage 1792 Charles E. Robbins Property Manage 1793 Anderson Mowing 1795 Charles E. Robbins Property Manage 1796 Charles E. Robbins Property Manage 1796 Charles E. Robbins Property Manage	Charles E. Robbins Property Manage detention mowing Anderson Mowing Charles E. Robbins Property Manage detention mowing detention mowing Charles E. Robbins Property Manage detention chemicals Charles E. Robbins Property Manage detention mowing Charles E. Robbins Property Manage detention mowing detention Charles E. Robbins Property Manage mowing rear ditch. Charles E. Robbins Property Manage mowing rear ditch. Charles E. Robbins Property Manage mowing rear ditch. Charles E. Robbins Property Manage mowing transcripting 1791. Charles E. Robbins Property Manage mowing transcripting 1792. Tradecson Mowing 1794. Manage mowing transcripting 1794. Charles E. Robbins Property Manage mowing transcripting 1795. Charles E. Robbins Property Manage mowing treat ditch. Charles E. Robbins Property Manage detention mowing.	800	1769	Trugreen Chemlawn	spring fertilizer/weed control	216.00
Charles E. Robbins Property Manage  1775 Anderson Mowing Charles E. Robbins Property Manage 1779 Charles E. Robbins Property Manage 1781 Charles E. Robbins Property Manage 1781 Charles E. Robbins Property Manage 1783 Charles E. Robbins Property Manage 1784 Charles E. Robbins Property Manage 1785 Charles E. Robbins Property Manage 1786 Anderson Mowing 1787 Charles E. Robbins Property Manage 1788 Anderson Mowing 1791 Charles E. Robbins Property Manage 1791 Charles E. Robbins Property Manage 1792 Charles E. Robbins Property Manage 1793 Charles E. Robbins Property Manage 1795 Charles E. Robbins Property Manage 1796 Charles E. Robbins Property Manage	Charles E. Robbins Property Manage defention mowing Anderson Mowing Charles E. Robbins Property Manage mowing detention Anderson Mowing Charles E. Robbins Property Manage detention chemicals Charles E. Robbins Property Manage detention chemicals Charles E. Robbins Property Manage detention chemicals Trial Charles E. Robbins Property Manage mowing detention Charles E. Robbins Property Manage detention chemicals Trigs Charles E. Robbins Property Manage detention mowing Trigs Charles E. Robbins Property Manage detention mowing Trigs Charles E. Robbins Property Manage detention mowing	200		Charles E. Robhins Property Manage	detention trash	3.24
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1779 Anderson Mowing 1781 Charles E. Robbins Property Manage. 1781 Charles E. Robbins Property Manage. 1781 Charles E. Robbins Property Manage. 1783 Charles E. Robbins Property Manage. 1783 Charles E. Robbins Property Manage. 1786 Anderson Mowing 1787 Charles E. Robbins Property Manage. 1788 Charles E. Robbins Property Manage. 1791 Charles E. Robbins Property Manage. 1791 Charles E. Robbins Property Manage. 1791 Anderson Mowing 1793 Anderson Mowing 1794 Charles E. Robbins Property Manage. 1795 Charles E. Robbins Property Manage. 1796 Charles E. Robbins Property Manage. 1796 Charles E. Robbins Property Manage. 1796 Charles E. Robbins Property Manage. 1797 Charles E. Robbins Property Manage. 1796 Charles E. Robbins Property Manage. 1797 Charles E. Robbins Property Ma	1779 Anderson Mowing 1779 Anderson Mowing 1781 Charles E Robbins Property Manage trash bags 1781 Charles E Robbins Property Manage trash bags 1781 Charles E Robbins Property Manage detention moving 1783 Charles E Robbins Property Manage detention chemicals 1783 Charles E Robbins Property Manage mowing roadways 1786 Charles E Robbins Property Manage mowing roadways 1787 Anderson Mowing 1787 Charles E Robbins Property Manage mowing rear ditch 1791 Charles E Robbins Property Manage mowing rear ditch 1791 Charles E Robbins Property Manage mowing rear ditch 1791 Anderson Mowing 1792 Anderson Mowing 1792 Anderson Mowing 1793 Trugreen Chemins Property Manage detention chemicals 1794 Charles E Robbins Property Manage detention 1795 Charles E Robbins Property Manage detention 1796 Charles E Robbins Property Manage detention 1797 Anderson Mowing 1792 Charles E Robbins Property Manage detention 1794 Charles E Robbins Property Manage detention 1795 Charles E Robbins Property Manage detention 1796 Charles E Robbins Property Manage detention 1797 Charles E Robbins Property Manage detention mowing 1798 Charles E Robbins Property Manage detention mowing	800	1776	Anderson Mowing	April Mowing	345.00
1781 Charles E. Robbins Property Manage 1781 Charles E. Robbins Property Manage 1781 Charles E. Robbins Property Manage 1783 Charles E. Robbins Property Manage 1786 Charles E. Robbins Property Manage 1787 Charles E. Robbins Property Manage 1788 Anderson Mowing Charles E. Robbins Property Manage 1789 Charles E. Robbins Property Manage 1791 Charles E. Robbins Property Manage 1792 Charles E. Robbins Property Manage 1793 Anderson Mowing Charles E. Robbins Property Manage 1795 Charles E. Robbins Property Manage	1781 Charles E. Robbins Property Manage. Way Working Charles E. Robbins Property Manage. Getention chemicals Charles E. Robbins Property Manage. Moving detention Charles E. Robbins Property Manage. Into Moving Tigg. Charles E. Robbins Property Manage. July moving Tigg. Charles E. Robbins Property Manage. July moving Tiggs. Charles E. Robbins Property Manage. July moving Tiggs. Charles E. Robbins Property Manage. July moving Tiggs. Charles E. Robbins Property Manage. Authoritical Manage. Authoritical Charles E. Robbins Property Manage. Authoritical Manage. Authoritical Charles E. Robbins Property Manage.	080	1779	Anderson Mountain	nowing detention	12.03
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1781 Charles E. Robbins Property Manage. 1783 Charles E. Robbins Property Manage. 1783 Trugeen Chemiawn 1785 Charles E. Robbins Property Manage. 1786 Charles E. Robbins Property Manage. 1787 Charles E. Robbins Property Manage. 1791 Charles E. Robbins Property Manage. 1791 Charles E. Robbins Property Manage. 1792 Anderson Mowing. 1793 Trugreen Chemiawn 1795 Charles E. Robbins Property Manage. 1794 Charles E. Robbins Property Manage. 1795 Charles E. Robbins Property Manage. 1796 Charles E. Robbins Property Manage. 1796 Charles E. Robbins Property Manage. 1797 Charles E. Robbins Property Manage.	1781 Charles E. Robbins Property Manage detention moving Charles E. Robbins Property Manage detention moving Triggene Chemisan Charles E. Robbins Property Manage moving detention Charles E. Robbins Property Manage moving cadways Anderson Moving Charles E. Robbins Property Manage moving rear dich Charles E. Robbins Property Manage detention chemicals Charles E. Robbins Property Manage detention Trige Charles E. Robbins Property Manage detention Charles E. Robbins Property Manage detention Trige Charles E. Robbins Property Manage detention Charles E. Robbins Property Manage detention Trige Charles E. Robbins Property Manage detention moving	900	1781	Charles E. Robbins Property Manage	defention abomicals	18.67
1783 Charles E. Robbins Property Manage 1785 Charles E. Robbins Property Manage 1786 Charles E. Robbins Property Manage 1787 Charles E. Robbins Property Manage 1788 Charles E. Robbins Property Manage 1791 Charles E. Robbins Property Manage 1791 Charles E. Robbins Property Manage 1792 Charles E. Robbins Property Manage 1793 Anderson Mowing 1795 Charles E. Robbins Property Manage	Charles E Robbins Property Manage  1783 Charles E Robbins Property Manage Charles E Robbins Property Manage Charles E Robbins Property Manage Trigreen Charles E Robbins Property Manage Thom Mowing Charles E Robbins Property Manage Trigreen Charles E Robbins Property Manage	900	1781	Charles F Robbins Property Manage	defendant chemicals	7.34
1783 Trugreen Chemiawn Charles E. Robbins Property Manage	Trugreen Chemiawn Summer crab/ferfilizer  Charles E Robbins Property Manage mowing detention Charles E Robbins Property Manage Inno Maying Charles E Robbins Property Manage Inno Maying Charles E Robbins Property Manage detention chemicals Charles E Robbins Property Manage detention charles in Charles E Robbins Property Manage detention charles in Charles E Robbins Property Manage detention mowing Charles E Robbins Property Manage detention mowing	900		Charles E Robbins Property Manage	determinen movering	13.41
Charles E. Robbins Property Manage Charles E. Robbins Property Manage Anderson Mowing T787 Charles E. Robbins Property Manage Togs Anderson Mowing T1792 Anderson Mowing T1793 Trugreen Chemiawn Charles E. Robbins Property Manage Togs Charles E. Robbins Property Manage	Charles E. Robbins Property Manage mowing detention Charles E. Robbins Property Manage mowing detention Charles E. Robbins Property Manage June Mowing Charles E. Robbins Property Manage mowing rear dirch Charles E. Robbins Property Manage mowing rear dirch Charles E. Robbins Property Manage parking lot landscaping Charles E. Robbins Property Manage July mowing Charles E. Robbins Property Manage July mowing Charles E. Robbins Property Manage mowing/free frim Charles E. Robbins Property Manage detention mowing	800	1783	Tolorean Chemiawn	common creatings	10.85
Charles E Robbins Property Manage 1786 Anderson Mowing 1787 Charles E Robbins Property Manage 1788 Charles E Robbins Property Manage 1791 Charles E Robbins Property Manage 1792 Anderson Mowing 1792 Anderson Mowing 1793 Trugreen Chemiawn 1795 Charles E. Robbins Property Manage	Charles E Robbins Property Manage mowing roadways  Anderson Mowing 1787 Charles E Robbins Property Manage detention chemicals 1788 Charles E Robbins Property Manage detention chemicals 1791 Charles E Robbins Property Manage detention 1792 Anderson Mowing 1793 Trugreen Chemicals 1793 Trugreen Chemicals 1795 Charles E Robbins Property Manage detention 1795 Charles E Robbins Property Manage detention 1796 Charles E Robbins Property Manage mowing/free tim 1795 Charles E Robbins Property Manage detention 1796 Charles E Robbins Property Manage detention 1797 Charles E Robbins Property Manage detention 1798 Charles E Robbins Property Manage detention	800		Charles F Robbins Property Manage	moving defention	00.412
1786 Anderson Mowing 1787 Charles E. Robbins Property Manage Anderson Mowing 1792 Anderson Mowing 1793 Charles E. Robbins Property Manage 1795 Charles E. Robbins Property Manage 17	1786 Anderson Mowing June Mowing June Mowing June Mowing 1787 Charles E. Robbins Property Manage mowing rear ditch Charles E. Robbins Property Manage mowing rear ditch Charles E. Robbins Property Manage mowing rear ditch Charles E. Robbins Property Manage defention Anderson Mowing T792 Anderson Mowing T792 Charles E. Robbins Property Manage defention Charles E. Robbins Property Manage mowing/tee trin Charles E. Robbins Property Manage detention mowing	800		Charles F Robbins Property Manage	monday roadways	31.35
1787 Charles E. Robbins Property Manage 1788 Charles E. Robbins Property Manage 1791 Charles E. Robbins Property Manage 1792 Charles E. Robbins Property Manage 1792 Anderson Mowing 1793 Trugreen Chemiawn 1795 Charles E. Robbins Property Manage 1795 Charles E. Robbins Property Manage 1795 Charles E. Robbins Property Manage 1796 Charles E. Robbins Property Manage	1787 Charles E. Robbins Property Manage defention chemicals T788 Charles E. Robbins Property Manage defention chemicals T791 Charles E. Robbins Property Manage defention charles E. Robbins Property Manage deletition T792 Anderson Mowing T793 Trugreen Chemidawn T794 Charles E. Robbins Property Manage deletition T795 Charles E. Robbins Property Manage deletition mowing	80	1786	Anderson Mowing	Inco Mound	00.00
1788 Charles E. Robbins Property Manage 1791 Charles E. Robbins Property Manage 1792 Charles E. Robbins Property Manage 1792 Anderson Mowing 1793 Trugreen Chemiawn 1795 Charles E. Robbins Property Manage 1796 Charles E. Robbins Property Manage	1788 Charles E. Robbins Property Manage moving rear ditch charles E. Robbins Property Manage moving rear ditch Charles E. Robbins Property Manage parking lot landscaping Charles E. Robbins Property Manage detertion 1792 Addresson Moving July moving Surmer crab/fertilizer Charles E. Robbins Property Manage moving/tree frim Charles E. Robbins Property Manage detention Charles E. Robbins Property Manage detention moving	08	1787	Charles F Robbins Property Manage	defection chemicals	430,00
1791 Charles E. Robbins Property Manage (791 Charles E. Robbins Property Manage 1792 Anderson Mowing Trans (793 Trugreen Chemiawn 1795 Charles E. Robbins Property Manage (795 Charles E. Robbins Property Manage 1795 Charles E.	1791 Charles E. Robbins Property Manage parking lot landscaping 1792 Anderson Mowing Library Manage detention 1793 Trugreen Chemins Property Manage detention 1795 Charles E. Robbins Property Manage mowing/free tim 1795 Charles E. Robbins Property Manage detention 1796 Charles E. Robbins Property Manage detention 1798 Charles E. Robbins Property Manage detention	08	1788	Charles E Robbins Property Manage	Describer of Clerificals	8.44
1791   Charles E. Robbins Property Manage     1792	1791 Charles E. Robbins Property Manage 1792 Anderson Mowing Troperty Manage 1793 Troperson Mowing July mowing 1793 Troperson Charles E. Robbins Property Manage 1795 Charles E. Robbins Property Manage detention Charles E. Robbins Property Manage detention mowing	800	1791	Charles E Robbins Property Manage	portion lot foodmoning	40.23
1792 Anderson Mowing 1793 Trugreen Chemiawn 1795 Charles E. Robbins Property Manage 1795 Charles E. Robbins Property Manage 1795 Charles E. Robbins Property Manage	1792 Anderson Mowing July mowing 1793 Trugreen Chemlawn Summer crabfiertilizer 2 1795 Charles E. Robbins Property Manage mowing/tree trim Charles E. Robbins Property Manage detention mowing	800	1791	Charles F Robbins Property Manage	defention	199.50
1793 Trugreen Chemiawn R 1795 Charles E. Robbins Property Manage Charles E. Robbins Property Manage 1795 Charles E. Robbins Property Manage	1793 Trugreen Chemiawn summer crab/ferfilizer 8 1795 Charles E. Robbins Property Manage mowing/tree trim 6 1795 Charles E. Robbins Property Manage detention 1798 Charles E. Robbins Property Manage detention	08	1792	Anderson Mowing	the mounted	32,28
6 1795 Charles E. Robbins Property Manage 6 1795 Charles E. Robbins Property Manage 1795 Charles E. Robbins Property Manage	6 1795 Charles E. Robbins Property Manage moving/free trim 6 1795 Charles E. Robbins Property Manage detention 1798 Charles E. Robbins Property Manage detention	08	1793	Tructeen Chemiawn	summer confidentians	345.00
6 1795 Charles E. Robins Property Manage	6 1795 Charles E. Robbins Property Manage detention 1798 Charles E. Robbins Property Manage detention mowing	900	1795	Charles F Robbins Property Manage	mountaine claurieringel	216.00
1708	1798 Charles E. Robbins Property Manage detention mowing	900	1795	Charles E. Robbins Property Manage	defection	196.00
account and and the same of th	district the state of the state	98	1798	Charles E Robbine Droperty Manage	determinant manufacture	30.11

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Magna Trust Company Trustee

Attachment 1

Proof of Claim

# Circuit City Partnership Transaction Detail by Account January through December 2008

Date	MuM	Мате	Метта	Amount
8000700	1706		Collection destablishment of the first and consequences of the party o	
0/3/2006	000	Chanes C. Robbins Property Manage.	frim bushes	65.79
9/2/2/00	1800	Anderson Mowing	Aug Mowing	73008
9/9/2008	1802	Charles E. Robbins Property Manage	weed killer enray	20.001
9/16/2008	1803	Charles F. Robbins Property Manage	detention moving	77.04
9/16/2008	1803	Charles F Robbine Property Monday	toot boom	4 06
9/30/2008	1808	Charles II Bobbin Decade: 25	liasii bays	16.97
8/30/2008	1808	Oheres E. Nobelis Floperiy Manage.	mowing detention	4.80
0/3/0/2/00 G	4808	Challes E. Nobolins Property Wanage	Pond Chemical	3.92
073077000	1000	Charles E. Robbins Property Manage.	mowing	400 00
9007000	500	I rugreen Chemiawn	fall fertilizer	216 00
10/6/2008	1810	Anderson Mawing	Sept mowing	36.512
11/11/2008	1814	Anderson Mowing	Oct mowing	340.00
11/11/2008	1815	Charles E. Robbins Property Manage	mowing defention	15 o # 0
11/11/2008	1816	Charles E. Robbins Property Manage	Mowing frash hade	- O - C - C - C - C - C - C - C - C - C
12/16/2008	1820	Dearduff Landscaping	frim and change from	21.12
12/16/2008	1821	Charles E. Robbins Property Manage	mowing detention	388.00
12/16/2008	1823	Anderson Mowing	Nov Mowins	- 5 - 10 - 5 - 10
Total Landscaping	ping		1	20.00
Maintenance				5,475.99
1/8/2008	1743	Charles E Bookins Dames	•	
4/18/2008	1768	Charles E. nobolins Properly Manage	root maintenance	62 50
5/30/2008	1778	Challes E. Mobolits Property Wahage	under payment	2 05
9/16/2008	1803	Charles in Parties of	checked roof	270.50
9/16/2008	1804	Desires E. Robbills Property Wanage.	root work	114.00
9/23/2008	1806	Change Reduing Systems, (nc.	checked roof	850 00
9/30/2008	1808	Charles Parking Inc.	Calk wall crack	10.97
10/22/2008	1812	Charles E. Nobhins Property Manage.	roof repair	377.00
Total Maintenance	2006	Para Francisco	and	13.34
				1,700.36
Parking lot	,			
8007///	1(4)	Ron Furman's Commercial Sweeping	Dec. Sweeping	160 00
1/17/2008	Trash Bags	Charles E. Robbins Property Manage.	trash bags	16 97
9002021	Maint, 1/07 - 20/08	Charles E. Robbins Property Manage.	trash pickup in parking lot	54.34
113 112008	105 # Val	Ron Furman's Commercial Sweeping	January sweeping	160 00
8007/7/7	Jan. Ut Lowe's purch	Charles E. Robbins Properly Manage	pothole filter	23.66
2/3/2009	Maint 1/21 - 2/3/08	Charles E. Robbins Property Manage	trash pickup	13.15
3/13/7000	1254	Charles E. Kobbins Property Manage	fill pot holes in parking lot	14.73
4/11/2008	1766	Non Furman's Commercial Sweeping	Feb sweeping	160.00
4/18/2008	1768	Challe Formalis Commercial Sweeping	Mar. Sweeping	160.00
5/13/2008	1772	Dog Europa's Comments Manage	asphalt patch for hole	13.99
6/11/2008	1780	Don Europa's Commercial Sweeping.	April sweeping	200.00
7/7/2008	1785	Con Furnadus Commercial Sweeping	May sweeping	160.00
8/5/2008	1794	Bor Furnan's Commercial Sweeping	June sweeping	160 00
8/12/2008	1795	Charles E Bothing Bound Man	July Parking	200.00
9/9/2008	1801	Ron Firman's Commercial Succession	asphait patching	139.86
9/30/2008	1808	Charles E Dobbing Drand, Marie	August Sweeping	160.00
10/6/2008	1811	Ron Furman's Commercial Sweeping	Sentember minoraliza	34.00
11/11/2008	1815	Ron Furman's Commercial Sweeping	October sweeping	200.00

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Magna Trust Company Trustee

Attachment 1

Proof of Claim

# Circuit City Partnership Transaction Detail by Account January through December 2008

Date	Num	Name	Memo	Amount
12/16/2008 12/16/2008	1819 1821	Ron Furman's Commercial Sweeping Charles E. Robbins Property Manage	November sweeping snowlice walkways	105.50
Total Parking lot	) lot			2,456.20
Snow Removal	ıxal			
1/2/2008	1740	Charles E. Robbins Property Manage	salt purchase	34 86
1/8/2008	1743	Charles E Robbins Property Manage.	salt for snowfice	55.00
1/14/2008	fce Melt remb.	Charles E. Robbins Property Manage	Ice Melt reimbursement	17.43
1/16/2008	loe Melt reimb	Charles E. Robbins Property Manage	Ice Melt	15.34
1/24/2008	foe Melt reimb.	Charles E. Robbins Property Manage	Reimb, for Ice Mett	69 17
1/30/2008	foe Melt reimb	Charles E. Robbins Property Manage	Ice Melt reimb	62.66
1/31/2008	Spread toe Melt	J. Duval Snow Removal Co.	Jan 17, 24,29,30/2008 Spread L.,	670.00
2/3/2008	Maint, 1/21 - 2/3/08	Charles E. Robbins Property Manage	snow on sidewalks	457.62
2/6/2008	SnowRemoval 1/31-2/1	J. Duval Snow Removal Co.	1/31/08 1.5 hrs. opening entran	1 050 00
2/15/2008	ice Melt reimb.	Charles E. Robbins Property Manage	Ice Melt purchased	32.05
3/13/2008	1753	J. Duval Snow Removal Co.	2122 2/28 3/5	1,835,00
3/13/2008		Charles E. Robbins Property Manage.	loe Melt purchased	25.21
3/13/2008		Charles E. Robbins Property Manage	sidewalk snow 2/22 2/28	180.00
3/13/2008		Charles E. Robbins Property Manage.	ice melt	32.32
3/13/2008		Charles E. Robbins Property Manage	ice melt	47.19
3/24/2008	1761	Charles E. Robbins Property Manage	salt for snow/ice 3/05/08	378.50
9/23/2008	1805	Charles E. Robbins Property Manage	Salt for winter	484 88
12/9/2008	1818	J. Duval Snow Removal Co.	spread foe melt 12/4/08	260 00
12/18/2008	1826	J. Duval Snow Removal Co.	spread ice melt 12/10-15/16/17	1,175.00
Total Snow Removal	Remova!			6,882.23
Total CAM				32,518,09
Insurance General Commercial	nmercial			
12/16/2008	1824	T. J. Nicoud & Company, LLC	2009 Insurance	5,658.00
Total Genera	Total General Commercial			5,658.00
Total Insurance				5,658.00
TOTAL				
IOIAL				38,176.09

Proof of Claim

10:48 AM 01/29/09

### Circuit City Partnership **Customer Balance Detail**

As of January 29, 2009

Туре	Date	Num	Amount	Balance	
Circuit City				12,936.57	
Invoice	1/1/2006	140	37.071.50	50,008.07	
Payment	1/1/2006	4130587	-37,071.50	12,936.57	
Invoice	2/1/2006	141	40,622.26	53,558.83	
Payment	2/1/2006	4149370	-40,622.26	12,936.57	
Invoice	3/1/2006	143	40,622.26	53,558.83	
Payment	3/6/2006		-40,622.26	12,936.57	
Invoice	4/1/2006	144	40,622.26	53,558.83	
Payment	4/1/2006		-40,622.26	12,936.57	
Invoice	5/1/2006	145	40,622.26	53,558.83	
Payment	5/1/2006	4191590	-40,622.26	12,936.57	
Invoice	6/1/2006	146	40,622.26	53,558.83	
Payment	6/1/2006	4204442	-40,622.26	12,936.57	
Invoice	7/1/2006	147	40,622.26	53,558.83	
Payment	7/1/2006		-40,622.26	12,936.57	
Invoice	8/1/2006	148	40,622.26	53,558.83	
Payment	8/1/2006	4232470	-40,622.26	12,936.57	
Invoice	9/1/2006	149	40,622.26	53,558.83	
Payment	9/1/2006	4248796	-40,622.26	12,936.57	
Invoice	10/1/2006	150	40,622.26	53,558.83	
Payment	10/2/2006	151	-40,622.26	12,936.57	
Invoice	11/1/2006	151	40,622.26	53,558.83	
Payment	11/1/2006		-40,622.26	12,936.57	
Invoice	12/1/2006	152	40,622.26	53,558.83	
Payment	12/1/2006		-40,622,26	12,936.57	
Invoice	1/1/2007	153	40,622.26	53,558.83	
Payment	1/1/2007		-40,622.26	12,936.57	
Invoice	2/1/2007	154	40,622.26	53,558.83	
Payment	2/8/2007	سر سر بر	-40,622.26	12,936.57	
Invoice	3/1/2007	155	40,622.26	53,558.83	
Payment	3/5/2007	4333688	-40,622.26	12,936.57	
Invoice	4/1/2007	156	40,622.26	53,558.83	
Payment	4/2/2007		-11,952.35	41,606.48	
Payment	4/2/2007	4 5 7	-40,622.26	984.22	
Invoice	4/11/2007	157	11,952.35	12,936.57	
Payment Invoice	4/30/2007	4 E O	-40,622,26	-27,685.69	
Invoice	5/1/2007 6/1/2007	158 159	40,622.26	12,936.57	
Payment	6/1/2007	4371253	40.622.26 -40,622.26	53,558.83	
Invoice	7/1/2007	160	40,622.26	12,936.57 53,558.83	
Payment	7/1/2007	004384006	-40,622.26	12,936.57	
Invoice	8/1/2007	162	40,622,26	53,558.83	
Payment	8/1/2007	102	-40,622.26	12,936.57	
Invoice	9/1/2007	163	40,622.26	53,558.83	
Payment	9/4/2007	100	-40,622.26	12,936.57	
Invoice	10/1/2007	164	40,622.26	53,558.83	
Payment	10/1/2007	4418841	-40,622.26	12,936.57	
Invoice	11/1/2007	165	40,622.26	53,558.83	
Payment	11/1/2007	4425049	-40.622.26	12,936.57	
Payment	11/26/2007		-40,622.26	-27,685.69	
Invoice	12/1/2007	166	40,622,26	12,936.57	
Invoice	1/1/2008	167	40,622.26	53,558.83	
Payment	1/1/2008		-40,622.26	12,936.57	
Invoice	1/8/2008	170	2.252.78	15,189.35	
Payment	1/29/2008		-40,622.26	-25,432.91	
Invoice	2/1/2008	168	40,622.26	15,189,35	ald Bal
Payment	2/4/2008		-7,910.78	7,278.57	Chil man
Invoice	3/1/2008	169	40,622.26	47,900.83	old Bal. Still ourse on acct.
Payment	3/6/2008		-40,622.26	7,278.57	was to
Invoice	4/1/2008	171	40,622.26	47,900.83	
Payment	4/1/2008		-40,622.26	7,278.57	
Invoice	5/1/2008	173	40,622.26	47,900.83	
Payment	5/1/2008		-40,622.26	7,278.57	
Invoice	6/1/2008	174	40,622.26	47,900.83	
Payment	6/1/2008		-40,622.26	7,278.57	
Invoice	7/1/2008	176	40,622.26	47,900.83	
Payment	7/7/2008	,,,	-40,622.26	7,278.57	
Invoice	8/1/2008	177	40,622.26	47,900.83	

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Desc Main Page 1 of 1

From: Origin ID: SPIA (217) 544-1144

**Emily Cour** Sorling law Firm 607 East Adams, Suite 800

Springfield, IL 62701

SHIP TO: (310) 823-9000

**BILL SENDER** 

Kurtzman Carson Consultants LLC Circuit City Stores, Inc. 2335 Alaska Avenue

El Segundo, CA 90245

Delivery Address Bar Code

Invoice # PO#

Ship Date: 29JAN09 ActWgt: 1.0 LB

Account#: S \*\*\*\*\*\*\*\*

CAD: 5677461/INET9011

Ref#

Dept#

0201

7962 9801 8436

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### KUTAK ROCK LLP

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Telephone: 217-544-1144

Co-counsel for Magna Trust Company, Trustee

### IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

In re:	
CIRCUIT CITY STORES, INC., et al.,	Case No. 08-35653-KRH
Debtors.	Chapter 11 Jointly Administered

### ADMINISTRATIVE CLAIM REQUEST OF MAGNA TRUST COMPANY, TRUSTEE FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSES FROM CIRCUIT CITY STORES, INC.

Magna Trust Company<sup>1</sup>, Trustee (the "Magna Trust"), a party in interest herein, by counsel, hereby requests allowance and payment of its administrative claim against the estate of Circuit City Stores, Inc., pursuant to 11 U.S.C. §§ 365(d)(3), 503(b) and 507(a)(2) and the Order Setting Administrative Bar Date and Procedures for filing and Objecting to Administrative Expense Requests entered by this Court on May 15, 2009 [Docket No. 3354] (the "Application"). In support of its Application, Magna Trust states the following:

**EXHIBIT** 

<sup>&</sup>lt;sup>1</sup> Magna Trust Company merged into Regions Bank subsequent to the execution of the below mentioned Lease, and, as a result Regions Bank is now trustee of this Illinois title holding land trust.

- 1. This Court has jurisdiction over the subject matter of the Application pursuant to 28 U.S.C. §§ 157(b) and 1334 (b). This is a core proceeding arising pursuant to 28 U.S.C. § 157(b)(2)(A) and (B). Venue is proper in this Court pursuant to 28 U.S.C. § 1409(a).
- 2. The statutory bases for the relief requested in the Application are §§ 365(d)(3), 503(b) and 507(a)(2) of the United States Bankruptcy Code (the "Code").

### Background

- 3. On November 10, 2008 (the "Petition Date"), Circuit City Stores, Inc. and its affiliated debtors (the "Debtors") filed a voluntary petition under Chapter 11 of the Bankruptcy Code in this Court. The Debtors continued to operate their business and properties as debtors-in-possession.
- 4. Pursuant to a Lease Agreement dated March 8, 1995 between Circuit City Stores, Inc. and Magna Trust Company, Trustee, under Trust Agreement dated January 26, 1995 and known as Trust No. 01-90-0182-00 (the "Lease"), Circuit City Stores, Inc. leased from Magna Trust real property located at the Southwest Plaza Shopping Center, Springfield, Illinois, as more fully defined in the Lease (the "Premises"). A copy of the Lease is attached hereto as **Exhibit A.**
- 5. Pursuant to the *Notice of Rejection of Unexpired Leases and Abandonment of Property* (Docket No. 2419) filed on March 4, 2009, the Debtors rejected the Lease effective March 11, 2009 (the "Rejection Date"). At all times from the date of filing of the Debtors' petition, to the Rejection Date, which was 121 days, the Debtors maintained and enjoyed possession of the Premises. The use and enjoyment of the Premises provided a benefit to the Debtors by providing them with an additional outlet through which to market and sell their assets.

- 6. Under the terms of the Lease, the Debtors were required to pay to Magna Trust the following: base minimum monthly rent, taxes, common area maintenance charges ("CAM"), insurance and other costs and charges. *See*, *e.g.*, Lease ¶ 4, 7, and 9. In addition, pursuant to paragraph 36(e) of the Lease, Debtors are obligated to pay attorneys' fees and costs incurred by Magna Trust in defending its rights under the Lease.
- 7. Since the Petition Date, the Debtors have failed to pay Magna Trust the above-referenced expenses due and owing under the terms of the Lease. To that end, Magna Trust has incurred damages related to lost rent, CAM, insurance and taxes. The total amount owed by the Debtors for the 121 days it occupied and enjoyed the Premises post-petition, pre-rejection, is \$70,137.54. The amount due consists of the following:

(1) Rent: November 11 through	1 November 30, 2008	\$ 27,081.51
(2) CAM & Insurance: Nov. 11	through Dec. 31, 2008	1,683.19
(3) CAM & Insurance: Jan. 1 tl	nrough March 11, 2009	2,272.04
(4) Real Estate Taxes: Nov. 11	through December 31, 2008	8 11,986.22
(5) Real Estate Taxes: January	1 through March 11, 2009	16,179.50
(6) Attorneys fees in defense of	frights under the Lease	\$ 10.935.08

### **TOTAL ADMINISTRATIVE CLAIM:**

\$70,137.54

- 8. Under 11 U.S.C. § 503(b)(1) creditors are allowed, as administrative expenses, the "actual, necessary costs and expenses of preserving the estate . . ." In order to ease the burden and reduce the costs to landlords, Congress enacted 11 U.S.C. § 365(d)(3). *In re Circuit City Stores, Inc.* 2009 Bankr. LEXIS 672 (Bankr. E.D. Va. 2009) *citing Santa Ana best Plaza, Ltd. v. Best Prods. Co. (In re Best Prods. Co.)*, 206 B.R. 404, 406.
- 9. Pursuant to 11 U.S.C. § 365(d)(3), the Debtors are required to "timely perform all obligations of the debtor . . . arising from and after the order for relief under any unexpired lease of non-residential real property, until such lease is assumed or rejected, not withstanding § 503(b)(1) . . ." In addition, this Court has held that, when properly asserted, "a lessor is entitled

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to recover all payments due under the lease (including rent, taxes, interest, late fees, and attorney's fees) as an administrative expense" *In re Circuit City Stores, Inc.*, 2009 Bankr. LEXIS 672, \*15-16 (Bankr. E.D. Va. 2009) *citing In re CIT Commc'ns Fin. Corp. v. Midway Airlines Corp.* (*In re Midway Airlines Corp.*), 406 F.3d 229, 235 (4th Cir. 2005).

- 10. Furthermore, in regards to a landlord's entitlement to administrative expense priority in claims such as this, this Court, applying the accrual method, has noted that "[a]nything accruing after the entry [of] the order for relief is a post-petition charge that may be elevated to administrative priority under 11 U.S.C. § 507(a). *In re Circuit City Stores, Inc.*, 2009 Bankr. LEXIS 672 at \*14, *citing In re Trak Auto*, 277 B.R. 655, 664 (Bankr. E.D. Va. 2002). In order to receive administrative priority under § 507, the lessor no longer needs to show that "debtor's continued possession of its space is a benefit to the estate." *In re Circuit City Stores, Inc.*, 2009 Bankr. LEXIS 672 at \*15 *citing In re Trak Auto Corp.*, 277 B.R. at 665. In addition, § 507(a)(2) does not require that a landlord show "the debtor's continued possession of its space is a benefit to the estate." *In re Circuit City Stores, Inc.*, 2009 Bankr. LEXIS 672 at \*15 *citing In re Trak Auto Corp.*, 277 B.R. at 665.
- 11. In this case, the rent, CAM and taxes are all obligations which arose under and pursuant to the terms of the Lease. Therefore, in accordance with § 365(d)(3), Magna Trust is entitled to recover those expenses. In addition, the costs are entitled to administrative expense priority in accordance with §§ 503(b) and 507(a)(2) and this Court's prior ruling.

WHEREFORE, and based on the above, and any hearing hereon, Magna Trust, respectfully requests an administrative expense claim in the amount of \$70,137.54 in the estate of Circuit City Stores, Inc., as more fully referenced in the above-captioned case.

Dated: Richmond, Virginia June 19, 2009 Respectfully submitted,

KUTAK ROCK LLP

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Springfield, Illinois 62705

Telephone: 217-544-1144

Co-counsel for Magna Trust Company, Trustee

### **CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury that on June 19, 2009, an original copy of the foregoing Administrative Claim Request was sent via overnight delivery to:

Circuit City Stores, Inc., et al. Claims Processing Dept. Kurtzman Carson Consultants LLC 2335 Alaska Avenue El Segundo, CA 90245

Counsel